

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

- v. -

RARE BREED TRIGGERS, LLC; RARE
BREED FIREARMS, LLC; LAWRENCE
DEMONICO; KEVIN MAXWELL,

Defendants.

1:23-CV-00369
(NRM) (RML)

DECLARATION OF MELISSA RODRIGUEZ

I, Melissa Rodriguez, have personal knowledge of the following facts set forth below, and if called as a witness I would testify as follows:

1. I serve as a Senior Forensic Auditor, with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF). I am currently assigned to the Financial Investigative Services Division and to the Tampa Field Division.

2. The Financial Investigative Services Division (FISD) provides comprehensive financial investigative services in support of ATF investigations.

3. The facts set forth in this declaration are based on my personal knowledge and experience; knowledge obtained during my participation in this investigation; information from other individuals, including other law enforcement officers conducting investigations into defendants; and my review of documents, public records, ATF records, and other sources of information.

4. This investigation involves the Rare Breed Triggers model FRT-15, manufactured, marketed and sold by defendants Rare Breed Triggers, LLC (RBT), Rare Breed Firearms, LLC

(RBF), Kevin Maxwell (Maxwell), and Lawrence DeMonico (DeMonico). The investigation also involves these Defendants' sale of the Wide Open Trigger (WOT).

5. In part, my role in ATF's investigation into RBT includes reviewing financial records produced by JPMorgan Chase, N.A. and Fifth Third Bank. The JP Morgan Chase, N.A documents were produced in response to a subpoena served by the United States on February 16, 2023 (JPMorgan Chase Records). The Fifth Third Bank records were produced in response to a subpoena served by the United States on May 16, 2023. This Declaration includes a summary of these financial records, a chart annexed as Exhibit A, bearing Bates Nos. USA_20530-38, which consists of a PowerPoint presentation summarizing the calculations set forth below, and a calculation of estimated profits resulting from the sale of the FRT-15s and Wide Open Triggers.

FRT-15 Sales By Rare Breed Triggers

According to the Rare Breed Triggers LLC website, the triggers retailed for \$380.00. Based on my review of the financial records described below, and using this retail sale price for an estimate, RBT sold over 103,000 triggers. This was estimated by taking the total deposit amount of \$39,388,838, as reflected by financial records I summarized, and dividing it by the retail sales price of \$380.00 ($\$39,388,838 / \$380 = 103,654.8$). This figure does not take into account any discounts given or any wholesale sales made at a lower sales price or a higher sales price.

RBT and Related Companies

10. Rare Breed Triggers LLC was first registered to do business in the State of Florida in May 2020. At that time there were four owners listed on the registration. They were Lawrence Demonico, Michael Register, Cole Leleux, and Kevin Maxwell. In December 2020, the registration was changed. All the previous individuals were removed except for Kevin Maxwell.

See USA_16527-16533. On or about the same time, seven additional companies were created. In November 2021, the registration of RBT was moved to North Dakota.

11. Business 1 – XYZ Distribution LLC DBA RB Trig LLC. This business was registered in the state of Wyoming on November 24, 2020. The DBA RB Trig LLC was filed on December 7, 2020. *See* USA_18999-19002.

12. Business 2 – ABC IP LLC. This business was registered in the state of Delaware on November 25, 2020. This business is owned by four other businesses. *See* USA_17554-17555. The businesses are Leleux LLC, Spider Hole LLC, AN 1861 LLC, and LAD LLC. *See* USA_17235-17236.

13. Business 3 – DEF Consulting LLC. This business was registered in the state of Delaware. This business is owned by four other businesses. The businesses are Leleux LLC, Spider Hole LLC, AN 1861 LLC, and LAD LLC.

14. Business 4 – Leleux LLC. This business was registered in the state of Florida on 11/24/2020. This business is owned solely by Cole Leleux. *See* USA_18644.

15. Business 5 – Spider Hole LLC. This business was registered in the state of Florida. This business is owned solely by Michael Register.

16. Business 6 – AN 1861 LLC. This business was registered in the state of Florida. This business is owned solely by Kevin Maxwell. *See* USA_17847.

17. Business 7 – LAD LLC. This business was registered in the state of Florida. This business is owned solely by Lawrence Demonico. *See* USA_18368-18379.

**RBT and Related Company Flow of Funds from Fifth Third Bank
and JP Morgan Records**

18. The sales of FRT – 15 Triggers were deposited into Rare Breed Trigger's JP Morgan Account -1008. The authorized signors on the account were Kevin Maxwell (Manager)

and Cole Leleux (Signor). *See* USA_15992. Lawrence Demonico was added as a Signor on 01/22/2021. *See* USA_15993. From 01/01/2021 to 12/01/2022, there was \$39,388,838 deposited. *See* USA_15997-16525.

19. During this same time frame, payments totaling \$35,628,260 were paid from the JP Morgan account -1008 to XYZ Distribution LLC DBA RB Trig LLC. The following payments were also made from the Rare Breed Triggers LLC account:

- a. Payments totaling \$216,00 were paid to Kelly Leleux.
- b. Payments totaling \$216,00 were paid to Lawrence Demonico.
- c. Payments totaling \$192,372 were paid to Black Rifle Co.
- d. Payments totaling \$130,760 were paid to Kevin Maxwell.
- e. Payments totaling \$107,400 were paid to Jennifer Pierson.
- f. Payments totaling \$21,359 were paid to Brian Luettker – FTINC LLC.
- g. Payments totaling \$9,428 were paid to Dan O’Kelly – International Firearm Specialist Academy.
- h. Payments totaling \$6,000 were paid to Rick Vasquez – Rick Vasquez Firearms LLC.
- i. On December 9, 2022, a transfer of \$329,490 was made to Cadence Bank. The account balance after the transfer was \$0.00 and the account was closed.

20. XYZ Distribution LLC DBA RB Trig LLC’s Fifth Third Bank Account -4747 was opened December 2020. The authorized signors on Fifth Third Bank Account -4747 were Cole Leleux (Managing Member/Signor), Michael Register (Managing Member/Signor), Lawrence Demonico (Managing Member/Signor), and Kevin Maxwell (Managing Member/Manager). *See* USA_19794 and 19803. This account was open a month until the JP Morgan Account -6295 was

opened. The remaining funds in Fifth Third Bank Account -7474 were transferred to JP Morgan Account -6295 and the Fifth Third Bank account was subsequently closed. The authorized signors on JP Morgan Account -6295 are Cole Leleux (Signor), Michael Register (Signor), Lawrence Demonico (Signor), and Kevin Maxwell (Manager). *See* USA_17231. From December 22, 2020 to April 28, 2023, there was \$39,388,838 deposited into these accounts from Rare Breed Triggers LLC: \$705,000 was deposited into Fifth Third Bank Account -4747 (*see* USA_19785-19805); and \$35,628,260 was deposited into JP Morgan Account -6295. *See* USA_18736-18998. The account balance as of April 28, 2023 was \$47,758.52. *See* USA_18993.

21. During the same time period, payments totaling \$28,150,030 were paid from JP Morgan account ended -6295 (held by XYZ Distrubution) to ABC IP LLC. The following payments were also made from JP Morgan account ended 6295 (held by XYZ Distrubution):

- a. Payments totaling \$7,224,809 were paid to Third Gen Manufacturing.
- b. Payments totaling \$524,596 were paid to DEF Consulting LLC.
- c. Payments totaling \$144,946 were paid to Black Spider Optics LLC.
- d. Payments totaling \$125,000 were paid to Janeway Machine INC.
- e. Payments totaling \$90,000 were paid to Work Holding Tools LLC.
- f. Payments totaling \$7,161 were paid to Brian Eicher.

22. ABC IP LLC's Fifth Third Bank Account -5900 was opened December 2020. The authorized signors on Fifth Third Bank Account -5900 were Cole Lcloux (Managing Member/Signor), Michael Register (Managing Member/Signor), Lawrence Demonico (Managing Member/Signor), and Kevin Maxwell (Managing Member/Signor). *See* USA_19825-19826 and 19835. This account was only open a month until JP Morgan Account -6833 was opened. The remaining funds in Fifth Third Bank Account -5900 were transferred to JP Morgan Account -6833

and the Fifth Third Bank account was subsequently closed. The authorized signors on JP Morgan Account -6833 are Cole Leleux (Signor), Michael Register (Signor), Lawrence Demonico (Signor), and Kevin Maxwell (Signor). *See* USA_17226. From December 22, 2020 to April 28, 2023, there was \$28,150,030 deposited into these accounts. Fifth Third Bank account ended -5900 received \$307,164 (*see* USA_19815-19837) and JP Morgan Account ending in -6833 received \$27,842,866 (*see* USA_17252-17553) from XYZ Distribution LLC DBA RB Trig LLC. The account balance as of April 28, 2023 was \$46,104.64. *See* USA_17544.

23. During the same time period, the following payments were made from the ABC IP LLC's account:

- a. Payments totaling \$6,836,782 were paid to LAD LLC.
- b. Payments totaling \$6,711,311 were paid to Leleux LLC.
- c. Payments totaling \$6,708,523 were paid to Spider Hole LLC.
- d. Payments totaling \$4,269,060 were paid to AN 1861 LLC.
- e. Payments totaling \$1,641,900 were paid to Wizard Labs.
- f. Payments totaling \$776,775 were paid to CRDB INC.
- g. Payments totaling \$12,056 were paid to Nicholas Gough.
- h. Payments totaling \$10,000 were paid to Brian Blakely.
- i. Payments totaling \$10,000 were paid to Wolf Tactical.

24. Leleux LLC's Fifth Third Bank Account -7724 was opened December 2020. The authorized signor on Fifth Third Bank Account -7724 was Cole Leleux (Manager). *See* USA_20214. This account was only open a month until JP Morgan Accounts -0018 and -5756 were opened. The remaining funds in Fifth Third Bank Account -7724 were transferred to JP Morgan Account -0018 and the Fifth Third Bank account was subsequently closed. The authorized

signor on JP Morgan Account -5756 is Cole Leleux (Manager). *See* USA_17230. From December 22, 2020 to April 28, 2023, there was \$6,854,518 deposited. \$69,023 was deposited into Fifth Third Bank Account ended -7724 (*see* USA_20207-20222) and \$6,785,495.34 was deposited into JP Morgan Account ended -5756. *See* USA_18425-18643. Based on my review of the financial records, \$6,711,311 came from ABC IP LLC and \$143,207 from DEF Consulting LLC. The account balance of JP Morgan Account ended 5756 as of 04/28/2023 was \$66,318.38. *See* USA_18638. The account balance of JP Morgan Account ended -0018 as of 04/28/2023 was \$202.58. *See* USA_18727. During this same time period, the following payments were made from the Leleux LLC's account ending -5756:

- a. Payments totaling \$5,108,756 were paid to Cole Leleux.
- b. Payments totaling \$418,358 were paid to Investments.
- c. Payments totaling \$332,718 were paid to Kelly Leleux.

25. Spider Hole LLC's Fifth Third Bank Account -5314 was opened December 2020. The authorized signor on Fifth Third Bank Account -5314 is Cole Leleux (Managing Member/Signor). *See* USA_19992-19993 and 19994. On January 1, 2021 Amy Register was added as a Managing Member/Signor to the account. *See* USA_19994. From December 22, 2020 to April 8, 2023, there was \$6,851,730 deposited. *See* USA_19879-20205. Based on my review of the financial records, \$6,708,523 came from ABC IP LLC and \$143,207 from DEF Consulting LLC. The account balance as of March 31, 2023 was \$4,327.84. *See* USA_19940. During the same time period, the following payments were made from the Spider Hole LLC's account:

- a. Payments totaling \$3,610,325 were paid to Michael Register.
- b. Payments totaling \$2,005,325 were paid to Amy Register.

- c. Payments totaling \$528,955 were paid to Investments.

26. AN 1861 LLC's Fifth Third Bank Account -0901 was opened December 2020. The authorized signor on Fifth Third Bank Account -0901 was Kevin Maxwell (Manager). *See* USA_19863 and 19872. This account was only open a month until JP Morgan Account -6782 was opened. The remaining funds in Fifth Third Bank Account -0901 were transferred to JP Morgan Account -6782 and the Fifth Third Bank account was subsequently closed. The authorized signor on JP Morgan Account -6782 is Kevin Maxwell (Manager). *See* USA_17227. From December 22, 2020 to April 28, 2023, there was \$4,359,099 deposited. \$43,923 was deposited into Fifth Third bank account ended -0901 (*see* USA_19858-19877) and \$4,315,176 was deposited into JP Morgan account ended -6782. *See* USA_17598-17846. Based on my review of the financial records, \$4,269,060 came from ABC IP LLC and \$90,0039 from DEF Consulting LLC. The account balance as of 04/28/2023 was \$18,543.68. *See* USA_17838. During the same time period, the following payments were made from the AN 1861 LLC's account:

- a. Payments totaling \$1,510,762 were paid to Kevin Maxwell.
- b. Payments totaling \$1,298,124 were paid to Investments.
- c. Payments totaling \$14,000 were paid to Michael Register.

27. LAD LLC's Fifth Third Bank Account -6338 was opened December 2020. The authorized signor on Fifth Third Bank Account -6338 was Lawrence Demonico (Managing Member). *See* USA_19847 and 19856. This account was only open a month until JP Morgan Account -0757 was opened. The remaining funds in Fifth Third Bank Account -6338 were transferred to JP Morgan Account -0757 and the Fifth Third Bank account was subsequently closed. The authorized signor on JP Morgan Account -0757 is Lawrence Demonico (Manager). *See* USA_17229. From December 22, 2020 to April 28, 2023, there was \$6,978,268 deposited.

\$69,023 (was deposited) into Fifth Third Bank Account ended 6338 (*see* USA_19839-19856), \$6,849,585 into JP Morgan Account ended 0757 (*see* USA_18084-18367), and \$59,660 into an unknown account. Based on my review of the financial records, \$6,836,782 came from ABC IP LLC, \$525,000 from a Frost Bank Account, and \$140,961 from DEF Consulting LLC. The account balance as of April 28, 2023 was \$351,832.98. *See* USA_18361. During the same time period, the following payments were made from the LAD LLC's account:

- a. Payments totaling \$2,468,791 were paid to Lawrence Demonico.
- b. Payments totaling \$1,370,912 were paid to Investments.
- c. Payments totaling \$1,341,982 were paid to an Unknown Bank.
- d. Payments totaling \$286,825 were paid to Pipe Hitters Union.
- e. Payments totaling \$158,106 were paid to Karli Demonico.
- f. Payments totaling \$57,054 were paid to Amplify Credit Union.

RBT and Related Company Owner's Money Received

28. Lawrence Demonico received payments totaling \$2,684,791. These were payments from LAD LLC and Rare Breed Trigger LLC. Kari Demonico also received payments totaling \$158,106 from LAD LLC.


29. Cole Leleux received payments totaling \$5,168,756. These were payments from Leleux LLC and Black Spider Optics (paid by Rare Breed Trigger LLC). Kelly Leleux also received payments totaling \$548,718 from Lelcux LLC and Rare Breed Trigger LLC.

30. Kevin Maxwell received payments totaling \$1,510,762. These were payments from AN 1861 LLC and Rare Breed Trigger LLC.

31. Michael Register received payments totaling \$3,830,922. These were payments from Spider Hole LLC, LAD LLC, Black Spider Optics (paid by Rare Breed Trigger LLC), and AN 1861 LLC. Amy Register also received payments totaling \$2,005,325 from Spider Hole LLC.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on July 25, 2023.

MELISSA
By: RODRIGUEZ  Digitally signed by MELISSA RODRIGUEZ
Date: 2023.07.25 15:22:12 -04'00'

Melissa Rodriguez
Senior Forensic Auditor
Executed July 25, 2023

Exhibit A

Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives
Office of Science and Technology



RARE BREED TRIGGER

Senior Forensic Auditor Melissa Rodriguez

Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives
Office of Science and Technology



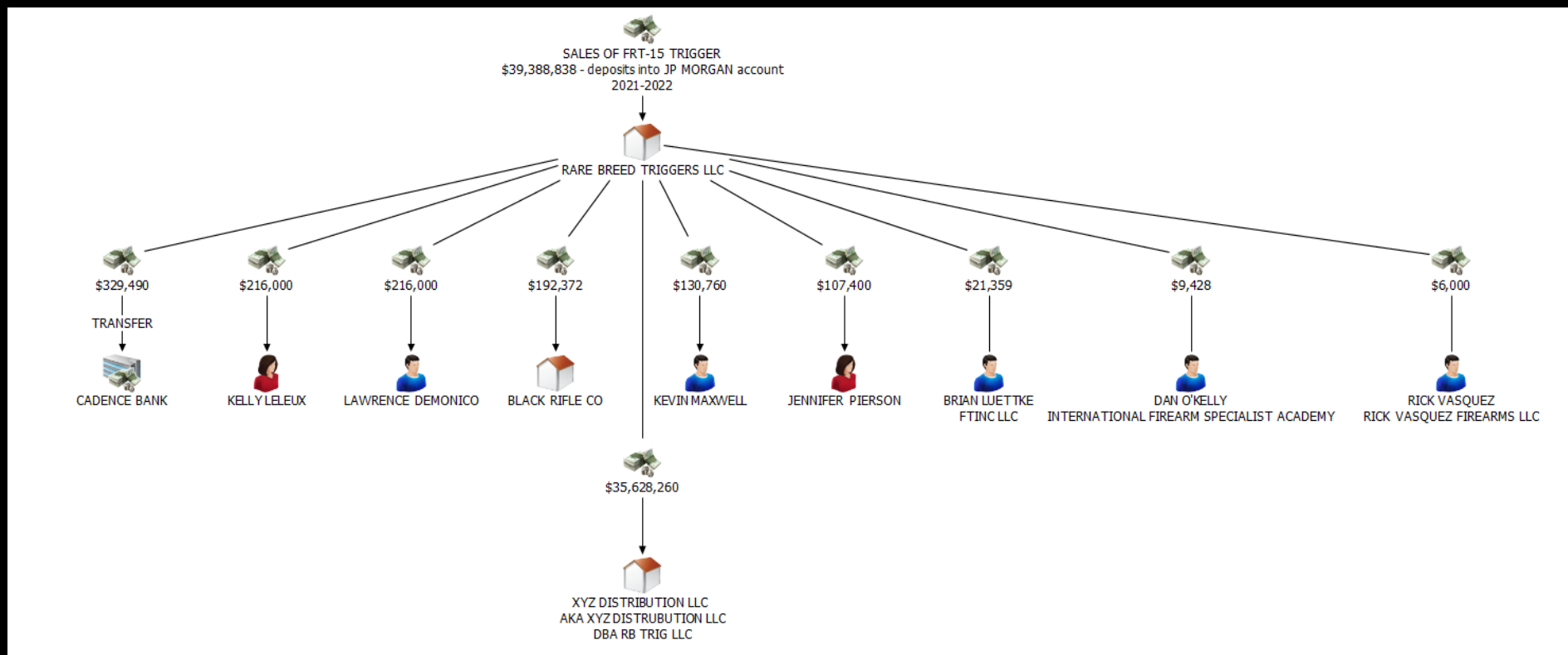
Ownership Information

- ◇ RARE BREED TRIGGERS LLC was first registered to do business in the State of Florida in April 2020. At that time there were four owners listed on the registration. They were Lawrence Demonico, Michael Register, Cole Leleux, and Kevin Maxwell.
 - ◇ In December 2020, right before the company started to sell the FR-15 Trigger, the registration was changed. All of the previous individuals were removed except for Kevin Maxwell.
 - ◇ In addition to the removal of the other individuals seven additional companies were created.
- ◇ Business 1 - XYZ DISTRUBUTION LLC DBA RB TRIG LLC. This business was registered in the state of Wyoming.
- ◇ Business 2 – ABC IP LLC. This business was registered in the state of Delaware.
- ◇ Business 3 – DEF CONSULTING LLC. This business was registered in the state of Delaware. This business is owned by four other businesses. The businesses are Leleux LLC, Spider Hole LLC, AN 1861 LLC, and LAD LLC.
- ◇ Business 4 – Leleux LLC. This business was registered in the state of Florida. This business is owned solely by Cole Leleux.
- ◇ Business 5 – Spider Hole LLC. This business was registered in the state of Florida. This business is owned solely by Michael Register.
- ◇ Business 6 – AN 1861 LLC. This business was registered in the state of Florida. This business is owned solely by Kevin Maxwell.
- ◇ Business 7 – LAD LLC. This business was registered in the state of Florida. This business is owned solely by Lawrence Demonico.

Department of Justice
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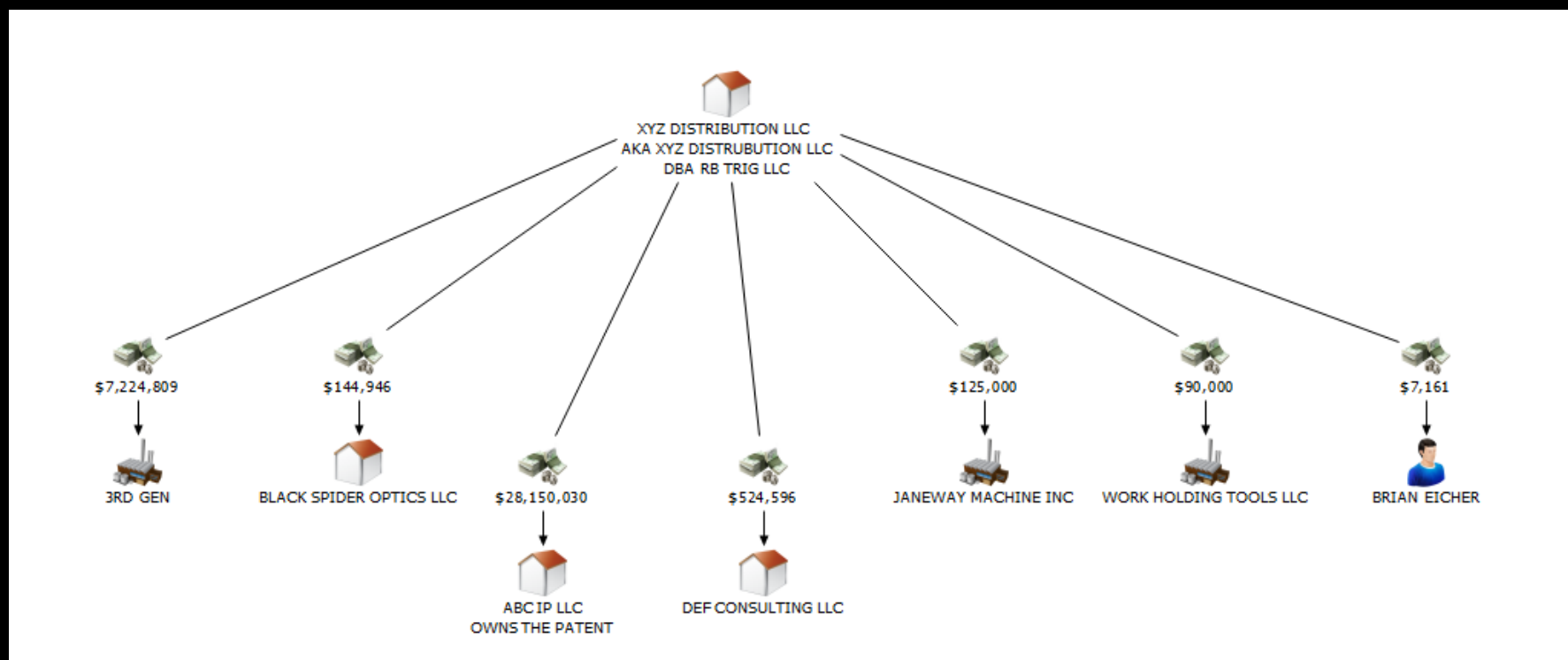
RARE BREED TRIGGER LLC



Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives
Office of Science and Technology



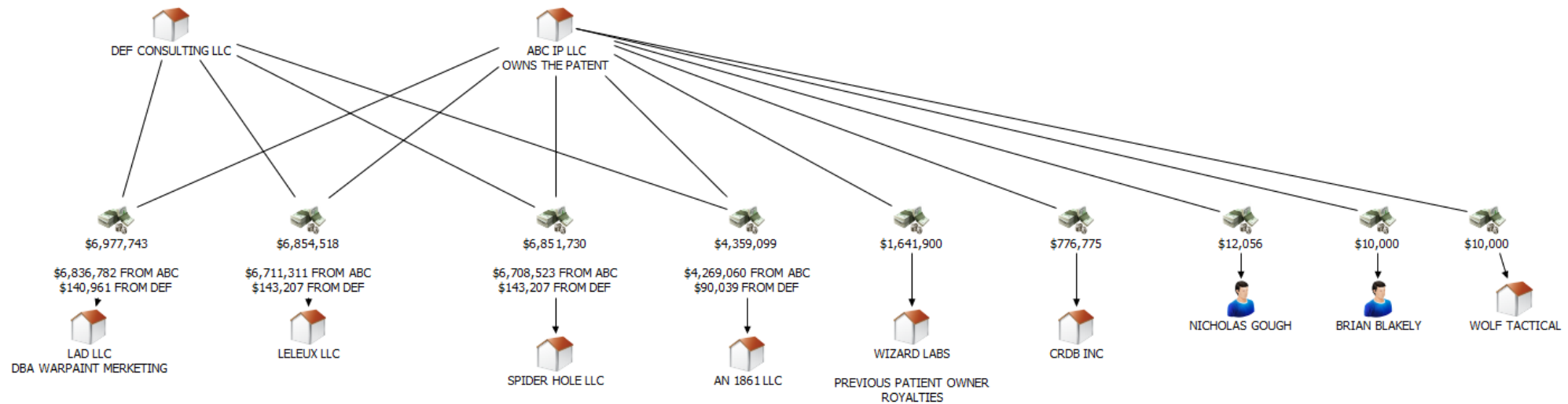
XYZ (RB TRIG LLC)



Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives
Office of Science and Technology



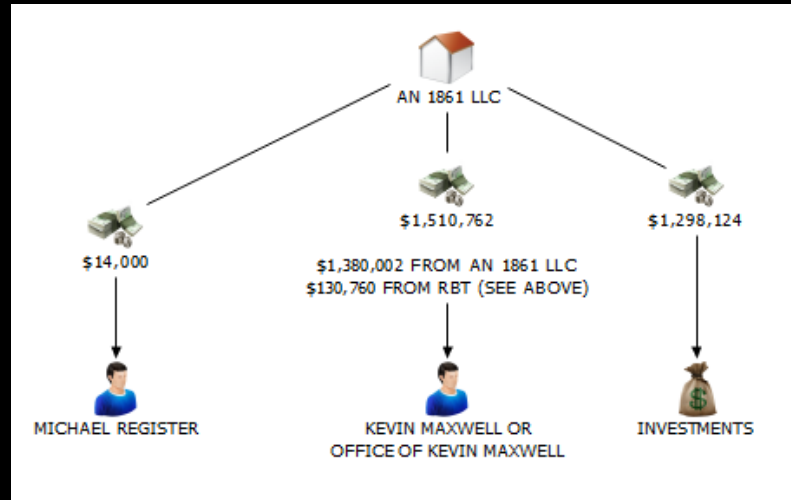
ABC IP LLC & DEF CONSULTING LLC



Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives
Office of Science and Technology



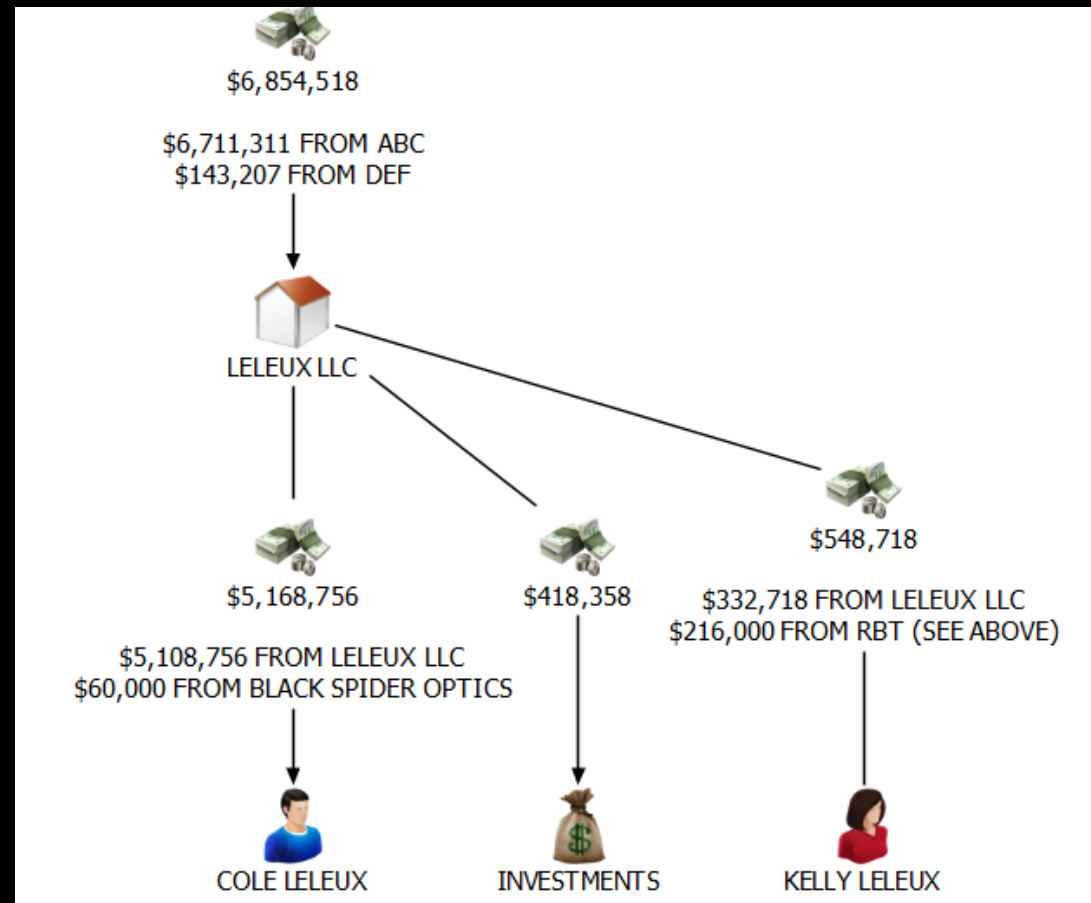
AN 1861 LLC



Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives
Office of Science and Technology



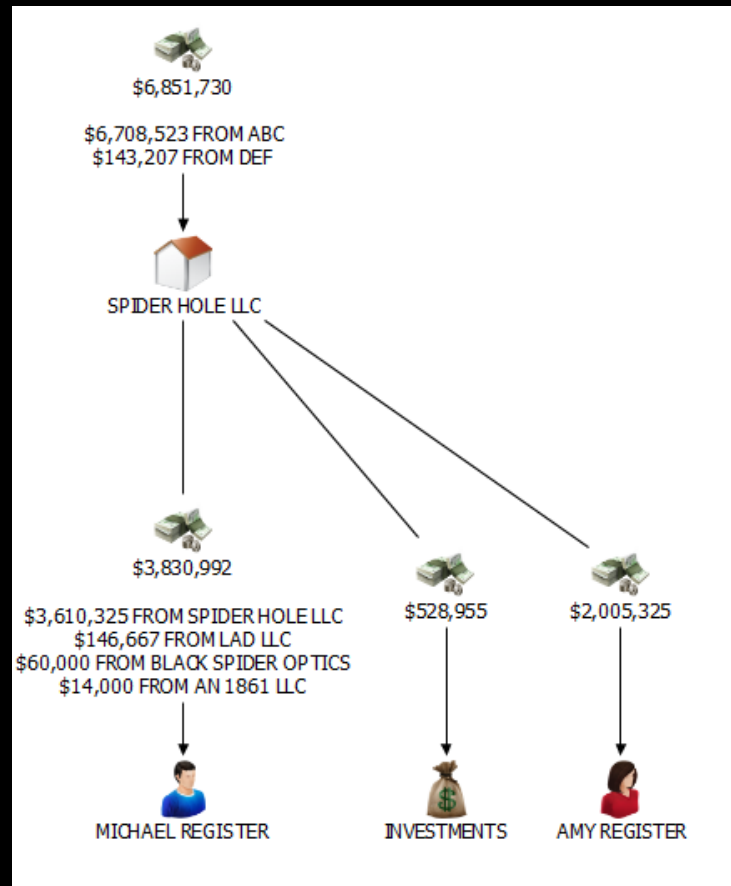
LELEUX LLC



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SPIDER HOLE LLC



Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives
Office of Science and Technology



END RESULT

